BARRY H. SPITZER, State Bar #161525 LAW OFFICE OF BARRY H. SPITZER 2150 River Plaza Drive, Suite 140 Sacramento, California 95833

Telephone: (916) 442-9002 Facsimile: (916) 442-9003

Attorneys for Chapter 7 Trustee Geoffrey Richards

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In re:

WILLIAM RAY POE and MARIA E. MORAES,

Debtors.

CASE NO. 22-20021-C-7

D.C. NO BHS-1

VERIFIED APPLICATION BY CHAPTER 7 TRUSTEE FOR APPROVAL OF EMPLOYMENT OF COUNSEL

The verified application of the duly appointed Chapter 7 trustee, Geoffrey Richards, ("the Trustee"), through his proposed attorney, Law Office of Barry H. Spitzer ("Attorney"), respectfully represents:

- 1. This case was commenced on January 4, 2023 and the Trustee was appointed the same day.
- 2. The Debtors have a claim against PG&E for the Camp Fire in Butte County in 2018 that was not disclosed on the Debtors Schedules. The Trustee has determined that he will need General Legal Counsel to assist him regarding the PG&E claim to allow the Estate to liquidate the assets.
- 3. It is necessary that the Trustee employ counsel to assist him in this matter pertaining to the PG&E claim described above, and as needed on other matters pertaining to the estate.
- 4. The Trustee desires court approval to employ Attorney as his counsel to handle this matter, since Attorney is experienced and well qualified to do so.

5. Attorney and the Trustee have discussed whether any conflicts of interest exist in this case between him and interested parties. Attorney is currently representing Nikki Farris in her capacity as a Chapter 7 Trustee in other cases, including cases involving claims against PG&E. Attorney has spoken with Ms. Farris and she does not have an opposition in Attorney's representation to the Trustee in this matter. Attorney is confident that his representation of Ms. Farris in other cases will not influence his representation of the Trustee in this matter. Otherwise, to the best of his knowledge, Attorney does not have connections with the debtor, the Trustee, persons employed by the Office of the United States Trustee, creditors of the debtor, any of the debtor's accountants, or any other party in interest in or having an interest in this case, or any of their respective attorneys and accountants, is a disinterested person as that term is defined in 11 U.S.C. Section 101(14).

WHEREFORE, the Trustee prays, through his proposed attorneys, that the court approve employment of Law Office of Barry H. Spitzer as his counsel to perform the professional services required by her as set forth hereinabove, and further, that the fees and expenses incurred as a result be allowed as an administrative expense, payable from funds of the estate upon a properly made application.

DATED: March 16, 2023

LAW OFFICE OF BARRY H. SPITZER

By:<u>\(\)(\(\)</u>

BARRY/H./SPITZER

Proposed Attorneys for

Geoffrey Richards, Chapter 7 Trustee

VERIFICATION

- I, Geoffrey Richards, declare:
- 1. I have been appointed as the duly appointed Chapter 7 trustee in the aboveentitled case.
- 2. I have requested the Law Office of Barry H. Spitzer represent me in my capacity as the Chapter 7 trustee.
- 3. I have read the foregoing Application of Chapter 7 Trustee for Approval of Employment of Counsel and know the contents thereof. I am informed and believe that the matters stated therein are true and on that ground I allege that the matters stated therein are true, except for matters stated therein on information and belief and on that basis I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 1/2, 2023 at Orinda, California.

GEOFFREY RICHARDS, TRUSTEE